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June 6, 2016

VIA ECF

The Honorable Michael A. Hammer, U.S.M.J.
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 2042
Newark, NJ 07101

Re: Leeza Garg v. Textiles From Europe, Inc. et al.
Case No.: 15-cv-07296 (ES)(MAH)

Dear Judge Hammer:

We represent the Plaintiff in the above-referenced case. On behalf of all parties, we write Your Honor to respectfully request a sixty (60) day extension of the fact discovery deadline currently set for June 29, 2016 as well as a corresponding adjournment of the post discovery status conference presently scheduled for June 30, 2016.

This is the parties' first request for a discovery extension. The parties have been diligent in their discovery efforts; the parties have exchanged discovery requests and responses thereto and have resolved several discovery disputes through correspondence and meet and confers. Although the parties are in the process of scheduling depositions, an extension of time is needed because the undersigned is currently lead counsel for the Plaintiff and will be on maternity leave beginning next week. Accordingly, another attorney in my office will require an extension of time to take over as lead counsel in my absence. Additionally, the parties have recently conferred and wish to explore the potential for resolution before incurring additional expense through depositions.

Based on the foregoing, the parties respectfully request an extension of the fact discovery deadline to August 30, 2016 as well as a corresponding adjournment of the status conference.

We thank Your Honor for your consideration in this matter.

Respectfully Submitted,

ARCÉ LAW GROUP, P.C.

/s/

Erica L. Shnayder, Esq.